



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

February 22, 2024

By ECF

The Honorable Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Chan, et al. v. U.S. Dep't of Transportation, et al.*, No. 23 Civ. 10365 (LJL)

Dear Judge Liman:

This Office represents the Federal Defendants in the above-captioned case. We write with the consent of plaintiffs and co-defendants to request that the Court exempt the Federal Defendants from filing the entire administrative record on the electronic docket of this case. Instead, the Federal Defendants propose to file a notice of lodging, record index, and supporting documents electronically via ECF, while simultaneously providing electronic versions of the record documents and a hyperlinked index to the record to the Court and the parties on flash drives.

The Federal Defendants make this request due to the size of the administrative record—approximately 1,600 documents totaling more than 47,000 pages, with a cumulative electronic file size exceeding thirty-five gigabytes. Due to the file size restriction of the Court's ECF system (ten megabytes per file), the administrative record cannot be filed on ECF without undertaking the cumbersome process of separating the record into numerous individual files, which would then need to be filed as separate docket entries.

Upon request of the Court, the Federal Defendants can facilitate compilation of an appendix of record materials cited by the parties during merits briefing for filing on the docket. Filing only those selections from the record will avoid cluttering the docket and provide the Court with a tailored set of record materials based on the briefing.

We thank the Court for its consideration of this request.

Respectfully Submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Zachary Bannon  
ZACHARY BANNON  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007